



NDA 20-958

Food and Drug Administration
Rockville MD 20857

Merck Research Laboratories
Attention: George Latyszonek
Director, Regulatory Affairs
P.O. Box 4, BLA-20
West Point, PA 19486-0004

OCT 16 2000

Dear Mr. Latyszonek:

Please refer to your new drug application (NDA) dated February 20, 1998, received February 20, 1998, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Pepcid® Complete [famotidine 10 mg/antacid (calcium carbonate 800 mg, and aluminum hydroxide 165 mg) Chewable Tablets.

We acknowledge receipt of your submissions dated June 9 and 23, July 14 and 28, August 2, 10 and 28, and October 4, 5, 10, and 12, 2000. Your submission of August 2, 2000, constituted a complete response to our June 20, 2000 action letter.

This new drug application provides for the use of Pepcid® Complete for use in the relief of heartburn associated with acid indigestion and sour stomach.

We have completed the review of this application, as amended, and have concluded that adequate information has been presented to demonstrate that the drug product is safe and effective for use as recommended in the agreed upon labeling text. Accordingly, the application is approved effective on the date of this letter.

The final printed labeling (FPL) must be identical to the submitted draft labeling dated August 2, 2000, and must be formatted in accordance with the requirements of 21 CFR 201.66. Marketing the product with FPL that is not identical to the approved labeling text and "Drug Facts" format may render the product misbranded and an unapproved new drug.

Please submit 20 paper copies of the FPL as soon as it is available, in no case more than 30 days after it is printed. Please individually mount ten of the copies on heavy-weight paper or similar material. Alternatively, you may submit the FPL electronically according to the guidance for industry titled *Providing Regulatory Submissions in Electronic Format - NDAs* (January 1999). For administrative purposes, this submission should be designated "FPL for approved NDA 20-958." Approval of this submission by FDA is not required before the labeling is used.

Please be reminded of your agreement to implement the labeling revisions specified in your communication dated October 12, 2000, at the time of the next printing.

Validation of the regulatory methods has not been completed. At the present time, it is the policy of the Center not to withdraw approval because the methods are being validated. Nevertheless, we expect your continued cooperation to resolve any problems that may be identified.

Be advised that, as of April 1, 1999, all applications for new active ingredients, new dosage forms, new indications, new routes of administration, and new dosing regimens are required to contain an assessment of the safety and effectiveness of the product in pediatric patients unless this requirement is waived or deferred (63 *FR* 66632). We note that you have not fulfilled the requirements of 21 CFR 314.55 (or 601.27). We are deferring submission of your pediatric studies until January 1, 2002. However, in the interim, please submit your pediatric drug development plans within 120 days from the date of this letter unless you believe a waiver is appropriate. Within approximately 120 days of receipt of your pediatric drug development plan, we will review your plan and notify you of its adequacy.

If you believe that this drug qualifies for a waiver of the pediatric study requirement, you should submit a request for a waiver with supporting information and documentation in accordance with the provisions of 21 CFR 314.55 within 60 days from the date of this letter. We will notify you within 120 days of receipt of your response whether a waiver is granted. If a waiver is not granted, we will ask you to submit your pediatric drug development plans within 120 days from the date of denial of the waiver.


Pediatric studies conducted under the terms of section 505A of the Federal Food, Drug, and Cosmetic Act may result in additional marketing exclusivity for certain products (pediatric exclusivity). You should refer to the *Guidance for Industry on Qualifying for Pediatric Exclusivity* (available on our website at www.fda.gov/cder/pediatric) for details. If you wish to qualify for pediatric exclusivity you should submit a "Proposed Pediatric Study Request" in addition to your plans for pediatric drug development described above. We recommend that you submit a Proposed Pediatric Study Request within 120 days from the date of this letter. If you are unable to meet this time frame but are interested in pediatric exclusivity, please notify the division in writing. FDA generally will not accept studies submitted to an NDA before issuance of a Written Request as responsive to a Written Request. Sponsors should obtain a Written Request before submitting pediatric studies to an NDA. If you do not submit a PPSR or indicate that you are interested in pediatric exclusivity, we will review your pediatric drug development plan and notify you of its adequacy. Please note that satisfaction of the requirements in 21 CFR 314.55 alone may not qualify you for pediatric exclusivity. FDA does not necessarily ask a sponsor to complete the same scope of studies to qualify for pediatric exclusivity as it does to fulfill the requirements of the pediatric rule.

In addition, please submit two copies of the introductory promotional materials that you propose to use for this product. All proposed materials should be submitted in draft or mock-up form, not final print. Please send one copy to the Division of Gastrointestinal and Coagulation Drug Products and one copy to the Division of Over-the-Counter Drug Products. For administrative purposes, this submission should be sent to the NDA and should be identified as new correspondence to approved NDA 20-958.

We remind you that you must comply with the requirements for an approved NDA set forth under 21 CFR 314.80 and 314.81.

In line with Center for Drug Evaluation and Research policy, oversight of this application is being transferred to the Division of Over-the-Counter Drug Products. If you have any questions, contact Dan Keravich, R.Ph., M.S., M.B.A., Project Manager, at (301) 827-2222.

Sincerely,


Charles Gandy, M.D.
Director
Division of Over-the-Counter Drug Products
Office of Drug Evaluation V
Center for Drug Evaluation and Research

10/16/00
FOR LT
Lilia Talarico, M.D.
Director
Division of Gastrointestinal and Coagulation
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